

REMARKS/ARGUMENTS

Claims 1-18 remain in this application. Claims 19 and 29 have been canceled. Claim 1 has been amended. Claims 20-28 have been withdrawn as the result of an earlier restriction requirement. Applicants retain the right to present Claims 19-29 in a divisional application.

II. THE REJECTION UNDER 35 U.S.C. §102

The examiner rejected claims 1,2,4, 10-12 under 35 U.S.C. §102(b) as being anticipated by Johnson, U.S. Patent No. 4,214,292. The examiner argues that Johnson teaches "a system for stacking platelets comprising in combination: a slotted (40 & 42) file (created by 44, 46 & 48) and a plurality of platelets (38) which fit into the slotted file (Figures)."

Johnson is directed to a guide spring which "provides a sufficient compressive grip upon the associated printed circuit board 38 and its desired electrical connection ... while also maintaining the opposite surface of the side portion of printed circuit board 38 in intimate contact with the supporting side wall of the associated supporting slot 40, 42." Col. 3, lines 42-54 (emphasis added). The present invention teaches the opposite of Johnson. At page 8, lines 10-12 of the present application, it states that "[t]he spacing between the platelets 404 is maintained by the groove interval and no pressure is required to hold the chips in place because of the rigidity of the slotted file 300." Claim 1 has been amended to clarify this feature of the invention. The structure created by 40, 42, 44, 46 and 48 of Johnson is not equivalent to the slotted file of the present invention because the structure of Johnson cannot hold a platelet or "printed circuit board 38" in position without a compressive grip being asserted on the platelet or "printed circuit board 38" by the guide spring. Clearly, Johnson cannot anticipate the present invention because no pressure is required to hold the platelets within the slotted file of the present invention.

III. THE REJECTIONS UNDER 35 U.S.C. §103

A. The Rejection of Claim 3 Over Johnson in View of Vafai

The examiner rejected Claim 3 under 35 U.S.C. §103(a) as being unpatentable over Johnson, US Patent 4,214,292, as applied to claim 1 above, and further in view of Vafai, US Patent 6,457, 515. Claim 3 depends from amended claim 1. As

explained in detail in Section II above, Johnson does not teach the slotted file of the present invention. Regardless of whether Vafai teaches "the use of silicon as a heat sink material," as argued by the examiner, it is undisputed that Vafai does not teach the slotted file of the present invention and cannot overcome Johnson's deficiency in this teaching. The combination of Johnson and Vafai would not teach or suggest to one of ordinary skill how to make the system for stacking platelets of the present invention.

B. The Rejection of Claims 5-9 Over Johnson

The examiner rejected Claims 5-9 under 35 U.S.C. §103(a) as being unpatentable over Johnson, US Patent 4,214,292, as applied to claim 1 above. Claims 5-9 are all dependent claims that ultimately depend from amended Claim 1.

As described in detail in Section II above, Johnson does not teach the system for stacking platelets, and particularly the slotted file, of the present invention. Furthermore, Johnson cannot suggest or render obvious the system of the present invention because Johnson's invention was a guide spring for providing a "compressive grip" upon the "printed circuit boards" of his invention to maintain their position. The present invention specifically teaches that no pressure is required to hold the platelets within the slotted file. Since Johnson teaches the exact opposite of the present invention, it cannot possibly render the present invention obvious to one of ordinary skill.

C. The Rejection of Claims 13-18 Over Johnson in View of King

The examiner rejected Claims 13-18 under 35 U.S.C. §103(a) as being unpatentable over Johnson, US Patent 4,214,292, as applied to claim 1 above, and further in view of King et al., US Patent 5,140,405. Claims 13-18 are all dependent claims that ultimately depend from amended Claim 1.


The examiner argues that King teaches "a semiconductor assembly comprising a chip carrier having a floor (40) and a frame (42) (Figure 6)." While the Applicant disagrees that the semiconductor assembly taught by King is equivalent to the platelets taught by the present invention, irrespective of this disagreement, it is undisputed that the teachings of King do not overcome the insufficiencies of Johnson as described in Section II above. Furthermore, King does not suggest or obviate the system for stacking platelets, particularly the slotted file, of the present invention.

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Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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